



GTE Telephone Operations

P.O. Box 152092
Irving, TX 75015-2092

February 12, 1993

Reply To
HQE02L38
Irving, TX

900/976 By Kris Kupczyk & Assoc.
P. O. Box 8159
Calabassas, CA 91372

Dear Enhanced Service Provider:

In an effort to keep you advised about changes in the telecommunication industry GTE is sending the following information to all known enhanced service providers (ESPs) currently operating in GTE franchised territory. Although GTE is not mandated by the FCC to comply with Computer Inquiry III CEI/ONA Rules it does so in many instances on a voluntary basis. As an ESP you can be both a customer and competitor of GTE. However, GTE has policies in place which protect you from unfair competitive advantage. One such policy is GTE's position on customer proprietary network information (CPNI). This notice advises you of your right concerning CPNI and how your account will be handled by GTE.

What Is CPNI?

CPNI is the individual data that has been accumulated by the telephone company in the course of furnishing regulated common-carrier services to you. Information that GTE will treat as CPNI includes:

- Type and quantity of regulated services purchased (i.e., basic service, touch call, Custom Calling, etc.)
- Repair information
- Traffic studies
- Station message detail recording information
- Usage data
- Calling patterns

Forwarded-to number and related information will be automatically restricted as CPNI, just like non-published numbers.

Information that GTE will not treat as CPNI includes:

- Customer name, address and telephone number (white pages information)
- Unregulated customer services and equipment (customer profile information such as CPE or enhanced services)
- Credit information

What Does Restricting CPNI Mean?

When you request that your CPNI be restricted it means any person within GTE who sells GTE's enhanced services, like voice messaging, is restricted from viewing your records. This may necessitate that your call cannot be processed by the first GTE representative answering your call. If your CPNI is restricted, your call may need to be transferred to a service representative who is allowed to view your records.

Who May View Your Customer Records?

Anyone within GTE who does not sell an enhanced service, like voice messaging, may view your records if you have elected to restrict it. This means that GTE personnel like repair and installation may view your records in order to provide you with timely, high quality services.

What Must You Do If You Would Like Your CPNI Restricted?

If you wish to have your CPNI restricted, you must send a written, signed request listing your telephone number(s) that are to be restricted to the GTE Business Office. This request will be kept on file at the Business Office. If you wish to unrestrict your CPNI at a later date, you must send another written, signed request to the GTE Business Office.

If you have any additional questions concerning CPNI, please contact your GTE Business Office.

Sincerely,
GTE Telephone Operations



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P.O. Box 152092
Irving, TX 75015-2092

Reply To
HQE02L38
Irving, TX

February 12, 1993

AAA Answering System
15605 S. Carmenita Road
Santa Fe Springs, CA 90670

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Sincerely,
GTE Telephone Operations

ATTACHMENT P

**CEI/ONA
IMPLEMENTATION GUIDELINES**

Prepared by:

Product Sales Programs

CSOC Operations Planning

ONA Compliance

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*FOR ADDITIONAL INFORMATION ON ONA,
PLEASE CONTACT ROGER GALLENSTEIN,
ONA IMPLEMENTATION AT 214/718-5187
OR T-MAIL, R.GALLENSTEIN.

**CEI/ONA
IMPLEMENTATION GUIDELINES**

PAGE 1

SUBJECT: PURPOSE PART 1

This document is being distributed to set guidelines relative to the implementation of Comparably Efficient Interconnection/Open Network Architecture (CEI/ONA). This information only pertains to GTE IntraLATA services.

It is imperative that the information contained in this material be reviewed with all Sales contact personnel (CSOC/BSOC/TAM/Major Accounts) that promote and/or sell enhanced services (Voice Messaging, Protocol Conversion products, i.e., Public Data Network and QuickConnect with Protocol Conversion).

Note: QuickConnect is not an Enhanced Service until Protocol Conversion is requested and provided by the utility.

SUBJECT: BACKGROUND PART 2

ONA is a regulatory policy and not a network architecture prescription or technology. Although, in all likelihood it will ultimately be broadened to encompass all Local Exchange Carriers (LECs), the policy deals specifically with the preconditions necessary for the removal of the Federal Communication Commission's (FCC) structural separation requirement for the Regional Bell Operating Companies (RBOC's) to offer enhanced services. Although not currently subject to the FCC's ONA order, GTE fully supports the principles of ONA and is complying with the spirit of the ONA order on a voluntary basis.

Despite its original intent, the policy now addresses more than just the non-structural separation issue in that it forces the RBOCs and indeed all LECs to recognize Enhanced Service Providers (ESPs) as customers and fosters an environment in which their needs are becoming understood and slowly addressed.

CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)

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SUBJECT: BACKGROUND (CONT'D)

PART 2

In its earlier Computer Inquiry (CI II) Order, the FCC created two classes of services, basic and enhanced. Basic services were those Public Network services over which the RBOCs exerted bottle-neck monopoly control and did not involve computer processing functions, whereas Enhanced Services were deemed competitive and computer processing function based. Basic Services continued to be regulated and Enhanced Services were deregulated. The RBOCs were permitted to offer Enhanced Services only through Fully Separate Subsidiaries. The FCC reasoned that this approach would prevent the RBOC from cross-subsidizing Enhanced Services with regulated profits and would create a level playing field for all competitors. The order did indeed create the level playing field, but did not encourage the RBOCs to provide Enhanced Services and the introduction of non-RBOC Enhanced Services lagged far behind expectations.

In 1985 the FCC was concerned that the enhanced services market was not developing as rapidly as it had hoped and questioned whether its past policies (e.g., the structural separation requirement) had contributed to the problem. In an effort to resolve its concerns, it initiated the Computer Inquiry III (CI III) proceeding which gave birth to the ONA concept.

In doing so, the FCC established two key objectives against which new policies could be judged. It wanted to:

- o Foster the growth of the enhanced services market
- o Permit the RBOCs to enter the enhanced services market, but with non-structural safeguards in place which would allow the FCC to discontinue its Computer Inquiry II structural separation requirement (e.g., separate subsidiary) for the RBOCs

CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)

PAGE 3

SUBJECT: BACKGROUND (CONT'D)

PART 2

The need for non-structural safeguards stemmed from the FCC's recognition that ESPs may be competitors as well as customers of the RBOCs, thus placing the RBOCs in a unique competitive position in which they could easily gather competitive information from an ESP's use of the regulated Public Network and use it to advantage their own ESP. Moreover, the FCC also recognized that RBOC ESPs could derive proprietary cost and technical advantages from their use of the RBOC operated regulated Public Network. The FCC's ONA rules were thus developed to put RBOC ESPs on equal footing with other ESPs and are based upon the following rule of thumb:

- o Any competitive advantage an RBOC ESP could derive, resulting from the RBOC's operation of the basic regulated Public Network should be neutralized

Using this rule of thumb, the FCC established two key ONA principles and developed its ONA policy from them:

- o Comparably Efficient Interconnection (CEI)
- o Non-structural safeguard rules

CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)

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SUBJECT: BACKGROUND (CONT'D)

PART 2

The FCC's CEI rules deal with the elimination of potential technical and cost advantages which RBOC ESPs could realize from RBOC operation of the regulated Public Network and are as follows:

- o Basic Service Unbundling
- o Price Terms & Conditions
- o Interface Functionality
- o Technical Performance
- o Non-discriminatory Installation & Repair
- o End User Access
- o CEI Availability
- o Customer Use Restrictions
- o Collocation/Minimization of Transport Costs

The FCC's non-structural safeguard rules deal with the elimination of potential competitive advantages RBOC ESPs could derive from their integration with regulated RBOC operations and are listed as follows:

- o Non-discrimination Reporting
- o Allocation of Joint & Common Costs
- o Network Information Disclosure
- o Customer Proprietary Network Information (CPNI)
- o Aggregate CPNI

Note: GTE is subject to all the above rules due to our Consent Decree, however not to the extent the RBOCs are.

**CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)**

PAGE 5

SUBJECT: DEFINITIONS

PART 3

Comparably Efficient Interconnection (CEI) -

Is a regulatory policy which allows open access to the local exchange network to all competitive providers of enhanced services. It provides non-discrimination safeguards to offer a "fair level playing field".

Open Network Architecture (ONA) -

Is a regulatory policy which requires equal access to the Business Services underlying a Local Exchange Company (LEC) enhanced service offerings.

Enhanced Service Provider (ESP) -

Is an entity that uses the communications network to deliver an enhanced service to a consumer, also in accordance with applicable regulatory requirements, claims the status of an ESP who provides an enhanced service under Section 64.702 of the FCC's Rules.

Customer Proprietary Network Information (CPNI) -

Is defined as private customer data related to the customer's basic network services.

CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)

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SUBJECT: DEFINITIONS (CONT'D)

PART 3

Enhanced Service -

An enhanced service refers to services offered over common carrier transmission facilities, which employ computer processing applications that act on the format, content, code, protocol or similar aspects of the subscriber's transmitted information; provide the subscriber additional, different or restricted or restructured information; or involve subscriber interaction with stored information.

ESP Sales - (GTE's)

Is defined as the Sales group designated to sell all services including enhanced services such as Voice Messaging/Protocol Conversion products. This Sales group will be required to transfer restricted CPNI accounts to the Non-ESP Sales group.

Non-ESP Sales - (GTE's)

Is defined as the Sales group which can sell all services **except** enhanced services such as Voice Messaging. This group will handle customer accounts which are CPNI Restricted.

Protocol Conversion -

The process of changing the data communications protocol at one port termination to a different data communications protocol at another port termination (e.g., asynchronous to X.25)

CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)

PAGE 7

SUBJECT: CSOC/BSOC/TAM/AE REQUIREMENTS PART 4

The introduction of CEI/ONA now provides our customers with the option of restricting their Customer Proprietary Network Information (CPNI) from GTE's Enhanced Service Provider Sales personnel (Sales and Marketing). As identified in Part 3, CPNI is defined as private customer data related to the customer's basic network services accumulated by GTE in the course of furnishing common carrier services. An example of CPNI information is as follows:

- o Type and quantity of regulated services purchased
- o Repair Information
- o Traffic Studies
- o SMDR Information
- o Usage Data
- o Customer Calling Patterns

Does not include:

- o Customer Name
- o Customer Address
- o Customer Telephone Number (e.g., white pages information)
- o Unregulated Customer Services
- o Equipment Purchased
- o Credit Information

**CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)**

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SUBJECT: CSOC/BSOC/TAM/AE REQUIREMENTS (CONT'D) PART 4

Non-Published (NP), non-listed (NL) and CALL Forward numbers are a Special Class of CPNI and are automatically restricted from outbound calling by any Sales Channel for the purpose of selling an Enhanced Service.

Note: This means, no change in our current business procedures relative to the aforementioned.

Customers requesting to restrict/unrestrict their account must be advised that a letter is required from them authorizing GTE to restrict/unrestrict their account from our Enhanced Service Providers-Sales. The customer Service Representative (CSR) / Business Service Representative (BSR)/Tele-Account Manager (TAM) or Account Executive (AE) is responsible for explaining to the customer how their account will be handled in the future. All correspondence relative to the customer's CPNI restriction/unrestriction must be maintained by the utility indefinitely. (See Attachment I on the Implications of CPNI Restriction.)

Note: Under no circumstance can the customer be persuaded by GTE to change their restriction.

GTE will protect and not release CPNI to any ESP (GTE or external party) unless a written request is received by the customer authorizing GTE to do so.

**CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)**

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SUBJECT: CSOC/BSOC/TAM/AE REQUIREMENTS (CONT'D) PART 4

Note: Letters received from an ESP Vendor on behalf of a customer are not acceptable; letters requesting CPNI Restriction must be signed and mailed directly from the customer. CPNI restriction will not be promoted, if the customer has an Enhanced Service and CPNI restriction has not been requested, all existing guidelines for disclosure of customer information apply.

In compliance with GTE's Plan which was submitted to the FCC, CEI/ONA introduces an entirely new concept in how GTE must handle its customers. This new concept causes GTE to establish a separate customer contact group specifically to handle those customer accounts with CPNI Restriction. Therefore, the CSOCs/BSOCs will be required to have a group of individuals (2 or 3) that will handle only Non-ESP services, and Major Accounts will require a separate person (i.e., Network Application Specialist/Assistant - Major Account Support).

Note: Network Application Specialists/Assistants - Major Account Support personnel are normally considered non proactive Enhanced Services Sales Personnel.

These individuals will be identified in this document as Non-ESP Sales. The Non-ESP Sales group will be able to handle all calls, with the exception of not being able to sell Enhanced Services. In addition, it is recommended that the Non-ESP Sales individuals be in a separate location from the existing ESP Sales force. It is recommended that in Areas which utilize the Automatic Call Distribution (ACD) system that networking could be accomplished so that one location can be responsible for the CPNI Restricted services with transferring capabilities.

The existing Sales force, will continue to proactively promote sales for all GTE services (including enhanced services) to unrestricted accounts. Due to the small number of CPNI restricted accounts forecasted, the customer contact group established for CPNI customers will be small in size. However, as our enhanced services expand or if more accounts than anticipated are restricted, further review will be necessary.

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IMPLEMENTATION GUIDELINES
(CONT'D)

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SUBJECT: CSOC/BSOC/TAM/AE REQUIREMENTS (CONT'D) PART 4

Because current systems cannot be modified to restrict ESP Sales from accessing a CPNI customer record, an order upon receipt of a customer's written request for CPNI will be issued to place an identifier on the customer's record to flag the account. The Customer Service Representative (CSR)/Business Service Representative (BSR) will be required to enter:

SORCES

An "R" order is required with the following:

- o In the Service and Equipment Category a new General Service and Equipment Code (GSEC) on Line 1 only -

Example

+SE= 1, CPNIRSTRICT;

Note: This GSEC must be entered when a customer requests to be restricted, and will be one of the identifiers to inform our CSOC/BSOC/TAM/AE. This GSEC is non-rated. This GSEC will not generate a bill message.

- o Add a Retained Remarks in the S&E Category as follows:

Example

+RMKR= SE= 1, ACCOUNT CPNI RESTRICTED, ALLOW (VENDOR NAME) INFO;

Note: The customer may request more than one ESP to obtain CPNI information from their account. There will not be any Service Order Charges associated to documenting the CPNI Restriction.

CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)

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SUBJECT: CSOC/BSOC/TAM/AE REQUIREMENTS (CONT'D) PART 4

NON-SORCES

A "C" order (record) is required with the following:

- o On Line 05 the BSR will be required to input the following:

Example

05 CPNIRSTRICT (translates to IOSC 08674 for the BMF)

Note: This IOSC must be entered when a customer requests to be restricted, and will be one of identifiers to inform our CSOC/BSOC/TAM/AE. This IOSC will be non-rated. This IOSC will not generate a bill message.

- o On a Miscellaneous Line the BSR will be required to note that the account is CPNI Restricted:

Example

1116*MISC; ACCOUNT CPNI RESTRICTED, ALLOW (VENDOR NAME) INFO

Note: The customer may request that more than one ESP have access to their CPNI information. There will not be any Service Order Charges associated to documenting the CPNI Restriction.

CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)

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SUBJECT: CSOC/BSOC/TAM/AE REQUIREMENTS (CONT'D) PART 4

This information will identify the account as being CPNI Restricted and alert the ESP Sales person to explain to the customer that due to their request to restrict their account, ESP Sales is unable to discuss any information relative to the customer's account.

ESP Sales will then be responsible for:

- o Verifying that the customer's account is not CPNI Restricted prior to starting their customer contact by requesting the customer's telephone number and checking either the S&E Category in those Areas utilizing SORCES, or confirming that the Line 05 does not indicate that the customer is CPNI Restricted for the Non-SORCES location.
- o Transferring all calls that are identified as CPNI restricted to the Non-ESP Sales group when the account is identified as restricted. The AE will now be required to pass the order onto the person designated for handling their restricted account.

Note: The CSR/BSR will be responsible for informing the customer that since they have requested CPNI Restriction the call must be transferred to the department which handles their account.

- o Informing the Customer Service Representative (CSR) or Business Service Representative (BSR) receiving the call of the customer's name, telephone number and the reason the customer has stated prior to completing the transfer.

Note: In areas where transfer capability does not exist, the customer should be advised that a CSR/BSR will contact them within four (4) business hours.

CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)

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SUBJECT: CSOC/BSOC/TAM/AE REQUIREMENTS (CONT'D) PART 4

The Non-ESP Sales group will be responsible for:

- o Discussing all customer's inquiries and promoting all services **except** for Voice Messaging and/or any other ESP Service.

Note: Only when the customer specifically asks questions relative to Voice Messaging and/or any other ESP Service will the CSR/BSR discuss the service, and that will only be to answer questions the customer may be asking.

Example:

If the customer asks for Voice Messaging Service/Protocol Conversion the CSR/BSR/Network Application Specialist/Assistant - Major Account Support can take his/her order; the CSR/BSR can answer the customers questions, but not proactively sell Voice Messaging/Protocol Conversion (cannot offer benefits or Sales pitch for Voice Messaging).

Note: Again, the CSR/BSR/Network Application Specialist/Assistant - Major Account Support will only provide information relative to an enhanced service on a "demand only" basis from the customer.

- o Issuing all orders establishing the CPNI restriction.
- o Notifying Sales (Field Sales, Major Accounts, and the Account Executives) of all requests for CPNI Restriction via internal distribution processes. (this may vary by Area). Information disseminated to Sales should include:

- Customer's Name
- Telephone Number

- Customer is requesting CPNI Restriction

**CEI/ONA
IMPLEMENTATION GUIDELINES
(CONT'D)**

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SUBJECT: CSOC/BSOC/TAM/AE REQUIREMENTS (CONT'D) PART 4

Upon notification from the BSOC that the customer has requested that their account is to be restricted, the TAM/AE representative will be responsible for contacting the customer via the "Advocacy Program" to explain how their account will be handled in the future; that their account is restricted from GTE Enhanced Sales and Marketing personnel. If the customer still wishes to keep their account restricted, the TAM/AE representative will thank the customer for their time and inform them that their records have been restricted.

Note: Under no circumstance should any attempt be made to persuade the customer to change their request to unrestrict CPNI.

A clerk will be responsible for inputting this information into the Small Business Support System (SBSS) so that future customer contacts will be avoided. In areas where SBSS is not on-line, each TAM representative must note the restriction on the customer profile.

If the customer decides to allow GTE's ESP Sales representatives access to their records after the TAM/AE representative has reviewed how his/her account is to be handled, the TAM/AE representative will be required to inform the customer that GTE would require a signed waiver letter stating that they are releasing their customer information to GTE's ESP Sales group. CSOC (R1 or B1) under no circumstances would provide a letter to the customer to sign. If the customer questions the TAM/AE representative as to what to put in the letter, the TAM/AE may suggest the verbiage shown in Attachment II. (Utilized primarily for medium/large size accounts).

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IMPLEMENTATION GUIDELINES
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SUBJECT: CSOC/BSOC/TAM/AE REQUIREMENTS (CONT'D) PART 4

Upon receipt of a letter from the customer requesting the removal of CPNI restriction, the TAM representative will forward the letter to the BSR for issuance of an order removing all the GSEC/IOSC and associated RMKR/MISC line(s).

Example:

SORCES

-SE= 1, CPNIRSTRCT;
-RMKR= SE= 1, ACCOUNT CPNI RESTRICTED;

ASOS

-05 CPNIRSTRCT
-11NN*MISC; ACCOUNT CPNI RESTRICTED

ATTACHMENT I

IMPLICATIONS

If the customer requests their account to have CPNI Restriction the following implications should be explained:

- o Their call will, upon receipt in the CSOC/BSOC, be transferred, causing additional waiting time to the customer, to a specific work group which does not sell Enhanced Services

or

- o A call back may be necessary if the specific work groups' line(s) are busy
- o Unable to keep him/her informed of future enhanced service offerings
- o Prohibits their account from viewing by GTE's Enhanced Sales/Marketing personnel

Note: Under no circumstance can any additional verbiage be used to persuade the customer to change their restriction.